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Attorneys for Defendant DM Group, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

DM GROUP, INC., et al.,

Defendants.

Civil Action No. 2:24-cv-4075-EP-LDW

**APPLICATION FOR EXTENSION OF
TIME PURSUANT TO
LOCAL FEDERAL RULE 6.1**

Application is hereby made pursuant to Local Federal Rule 6.1 for a Clerk's Order extending the time within which Defendant DM Group, Inc. ("DM Group") may answer, move or otherwise respond to the Complaint filed by Plaintiffs Atlas Data Privacy Corporation, Jane Doe-1, Jane Doe-2, Patrick Colligan, and Peter Andreyev ("Plaintiffs"), and it is represented that:

1. Plaintiffs filed their Complaint on February 13, 2024.
2. DM Group was served with the Complaint on March 8, 2024.
3. DM Group filed a Petition for Removal with this Court pursuant to 28 U.S.C.

§ 1446 on March 21, 2024 (ECF Doc. No 1). The Petition was filed within thirty (30) days of DM Group's receipt "through service or otherwise, of a copy of the initial pleading setting forth the claim for relief upon which such action or proceeding is based." 28 U.S.C. § 1446(b).

4. DM Group did not answer, move or otherwise reply to the Complaint in state court. Pursuant to Fed. R. Civ. P. 81(c)(2), DM Group's response to the Complaint is due within the longest of these periods: "(A) 21 days after receiving—through service or otherwise—a copy of the initial pleading stating the claim for relief; (B) 21 days after being served with the summons for an initial pleading on file at the time of service; or (C) 7 days after the notice of removal is filed."

5. Accordingly, DM Group's response to the Complaint is due 7 days after March 21, 2024 – the longest period provided under Rule 81(c) – or March 28, 2024, which date is determined under Fed. R. Civ. P. 6(a). Thus, DM Group's time to answer or otherwise respond to the Complaint has not yet expired.

6. No similar extensions of time to respond to this pleading has been obtained by DM Group.

7. DM Group requests, pursuant to L.Civ.R. 6.1(b), that the Clerk enter an Order extending the time in which DM Group may answer, move or otherwise respond to the Complaint by 14 days or until April 11, 2024.

By: /s/ Angelo A. Stio III
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Dated: March 27, 2024

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**ORDER GRANTING APPLICATION FOR
AN EXTENSION OF TIME PURSUANT TO
L.CIV.R. 6.1**

The Application of Defendant DM Group, Inc. (“DM Group”) for an Extension of Time to Answer, Move or Otherwise Respond to Plaintiff’s Complaint is **GRANTED**. DM Group’s time to answer, move or otherwise respond to the Complaint is extended by fourteen (14) days up to and including April 11, 2024

ORDER DATED _____

WILLIAM T. WALSH, Clerk

By: _____
Deputy Clerk